

Comment Set D Southern California Edison



December 11, 2014

VIA E-MAIL & OVERNIGHT DELIVERY

Jensen Uchida
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
jensen.uchida@cpuc.ca.gov

**Re: SCE Review of Draft IS/MND in support of the
Banducci Substation Project**

Dear Jensen:

Southern California Edison Company (SCE) respectfully submits to the following comments on the draft Initial Study (IS) / Mitigated Negative Declaration (MND) circulated in support of proposed Banducci Substation Project (Banducci or Project). A matrix containing SCE's comments and edits is attached for convenience. SCE's comments primarily make clarifying corrections and do not substantively challenge the environmental analyses documented in the IS/MND or mitigation measures proposed in support of the Project.

There are three repeating issues indicated on the attached matrix which SCE notes here for your convenience. First, the IS/MND makes various references to SCE's applicant proposed measures (APMs). SCE has suggested minor edits as well as the inclusion of a footnote in certain sections to make clear that the Project's mitigation measures capture SCE's APMs, either by expanding upon them or adding detail to them, and for the purposes of the Project's construction, supersede SCE's APMs.

Second, while the mitigation monitoring plan in Chapter 6 accurately reflects the Project's discussed mitigation measures, there are some inconsistencies with these mitigation measures as they are presented in Chapter 5. SCE has offered corrections in Chapter 5 to ensure consistency with Chapter 6.

Third, the Regulatory Background section of certain Chapters (*e.g.*, 5.2, 5.13, 5.14, *etc.*) contains language describing the relationship of local regulations to public utility projects under General Order 131-D. SCE suggests this language be included in each Regulatory Background section within Chapter 5.

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P.O. Box 800
2244 Walnut Grove Ave.
Rosemead, CA 91770

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Again, SCE appreciates the opportunity to provide comments on the IS/MND. If you have any questions regarding this letter, or would like to discuss any aspect in greater detail, please contact me at (626) 302 – 8128.

Very truly yours,



Susan J. Nelson, AIA

cc: Hedy Koczwar, Aspen Environmental Group (e-mail only)
Alex Gutierrez, SCE (e-mail only)

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ATTACHMENT 1

SCE's proposed edits to the draft Banducci IS/MND

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Chapter	Page	IS/MND Language	SCE Recommendations
1	1-4	<p>SCE's PEA identified measures to address potentially significant environmental impacts — the Applicant Proposed Measures (APMs) — and these APMs are considered to be part of the description of the Proposed Project. Based on the Initial Study analysis, additional mitigation measures are identified for adoption to ensure that impacts of the Proposed Project would be less than significant. The additional mitigation measures either supplement, or supersede the APMs. SCE has agreed to implement all of the additional recommended mitigation measures as part of the Proposed Project.</p>	<p>SCE's APMs are superseded by the applicable mitigation measures. To clarify, SCE recommends the following changes.</p> <p>SCE's PEA identified measures to address potentially significant environmental impacts — the Applicant Proposed Measures (APMs)—and these APMs are considered to be part of the description of the Proposed Project. Based on the Initial Study analysis, additional mitigation measures are identified for adoption to ensure that impacts of the Proposed Project would be less than significant. The additional mitigation measures either supplement, or supersede the APMs. SCE has agreed to implement all of the additional recommended mitigation measures as part of the Proposed Project.</p>
1	1-19	<p>Use Non-potable Water for Dust Control or Soil Compaction. Project water supply for dust control or soil compaction activities shall be obtained from non-potable sources, if available, and ensured in a water contract through a local water agency or district.</p>	<p>Please revise the mitigation measure below to be consistent with the MMCRP in Section 6.</p> <p>Use Non-potable Water for Dust Control or Soil Compaction. Project water supply for dust control or soil compaction activities shall be obtained from non-potable sources, if <u>reasonably available from local water purveyors</u>, and ensured in a water contract through a local water agency or district.</p>

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4	4-39	<p>4.14 Applicant Proposed Measures</p> <p>SCE proposes to implement measures to ensure the Proposed Project would occur with minimal environmental impacts in a manner consistent with applicable rules and regulations. SCE proposes to implement these measures during the design, construction, and operation of the Proposed Project in order to avoid or minimize potential environmental impacts.</p> <p>Applicant Proposed Measures (APMs) listed in Table 4-5 are considered part of the Proposed Project and are considered in the evaluation of environmental impacts (see Section 5, Environmental Analysis and Mitigation). CPUC approval would be based upon SCE adhering to the Proposed Project as described in this document, including this project description and the APMs, as well as any adopted mitigation measures identified by this Initial Study.</p> <p>Table 4-5 details each APM by environmental issue area. In some cases, mitigation measures presented in Section 5 either expand upon or add detail to the APMs presented in Table 4-5, if necessary, to ensure that potential impacts would be reduced to less than significant levels.</p>	<p>SCE's APMs are superseded by the applicable mitigation measures. To clarify, SCE recommends the following changes.</p> <p>4.14 Applicant Proposed Measures</p> <p>SCE's PE <u>proposes to implement measures contained Applicant Proposed Measures (APMs) to ensure the Proposed Project would occur with minimal environmental impacts in a manner consistent with applicable rules and regulations. SCE proposes to implement these measures during the design, construction, and operation of the Proposed Project in order to avoid or minimize potential environmental impacts.</u></p> <p><u>SCE's originally proposed APMs Applicant Proposed Measures (APMs) listed in Table 4-5 are included within and are superseded by the various mitigation measures summarized in Section 6 herein. These mitigation measures considered part of the Proposed Project and are considered in the evaluation of environmental impacts (see Section 5, Environmental Analysis and Mitigation). CPUC approval would be based upon SCE adhering to the Proposed Project as described in this document, including this project description, and the APMs as well as any adopted mitigation measures identified by this Initial Study.</u></p> <p>Table 4-5 details each APM by environmental issue area. In some cases, The mitigation measures presented referenced in Section 5 either expand upon or add detail to the APMs presented in Table 4-5 and for the purposes of the Proposed Project, supersede them. These mitigation measures if necessary, to ensure that potential impacts would be reduced to less than significant levels.</p>
Table 4-2	56	<p>Table 4-2. Potential Staging Yard Locations</p> <p>Yard Name Location Condition</p> <p>Approximate Area Project Component</p> <p>Southwest corner of Steuber Road and Highline Road</p>	<p>Based on SCE's understanding, the location of the staging yard described is incorrect. SCE recommends the following revision.</p> <p>Southwest corner of <u>Jameson Street Steuber Road</u> and Highline Road</p>

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4.5 Project Location	4-1	A total of 30 miles of fiber optic conduit and cable would be installed in a loop between the proposed Banducci Substation....	SCE is currently proposing approximately 32 miles of fiber optic telecommunications cable, and requests the following revision for clarification. A total of 30 miles of fiber optic conduit and cable would be installed in a loop between the proposed Banducci Substation.... Approximately 32 miles of fiber optic telecommunications cable would be installed in a loop between the proposed Banducci Substation....
4.6 Surrounding Land Uses and Setting	4-1	The Proposed Project is located entirely within unincorporated Kern County, California.	It appears that portions of the project may extend within the City of Tehachapi. For clarification, SCE recommends the following revision. The majority of the Proposed Project is located entirely within unincorporated Kern County, California.
4.10.1.6	4-8	Prior to commencing construction, SCE would develop an appropriate drought-resistant landscaping plan and perimeter wall design that would be submitted to Kern County with the ministerial grading permit application for the Proposed Project.	SCE recommends the following revision to clarify permitting requirements. Prior to commencing construction, SCE would develop an appropriate drought-resistant landscaping plan and perimeter wall design in consultation with that would be submitted to Kern County. with the ministerial grading permit application for the Proposed Project.
4.10.5	4-17	Continue west in approximately 160 feet of new conduit into the existing Monolith Substation.	SCE recommends the following revision to clarify scope. Continue west in approximately 160 feet of new- existing conduit into the existing Monolith Substation.

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4.11.4.1 Tubular Steel Pole Installation	59	The hole would be drilled using truck or track-mounted excavators. Excavated material would be temporarily stored in the staging yard prior to being salvaged, recycled, or disposed.	In an effort to remove the least amount of material, SCE recommends the following revision. The hole would be drilled using truck or track-mounted excavators. Excavated material would be <u>would either be used as backfill for new TSPs, made available for use by the landowner, or disposed of off-site at an appropriately licensed waste facility temporarily stored in the staging yard prior to being salvaged, recycled, or disposed.</u>
4.11.4.2 Wood Pole Installation	59	Each wood pole would require a hole to be excavated using an auger, backhoe, or hand tools. Excavated material would be temporarily stored in the staging yard prior to being salvaged, recycled, or disposed.	In an effort to remove the least amount of material, SCE recommends the following revision. Each wood pole would require a hole to be excavated using an auger, backhoe, or hand tools. Excavated material would be <u>would either be used as backfill for new wood poles, made available for use by the landowner, or disposed of off-site at an appropriately licensed waste facility temporarily stored in the staging yard prior to being salvaged, recycled, or disposed.</u>
4.11.4.3 Lightweight Steel Pole Installation	59	Each LWS pole would require a hole to be excavated using either an auger or excavated with a backhoe. Excavated material would be temporarily stored in the staging yard prior to being salvaged, recycled, or disposed.	In an effort to remove the least amount of material, SCE recommends the following revision. Each LWS pole would require a hole to be excavated using either an auger or excavated with a backhoe. Excavated material would be <u>would either be used as backfill for new LWS poles, made available for use by the landowner, or disposed of off-site at an appropriately licensed waste facility temporarily stored in the staging yard prior to being salvaged, recycled, or disposed.</u>

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5	5-138	The Proposed Project Area includes the 6.3-acre substation site and a total of 30 miles of fiber optic telecommunication routes with a 30-meter buffer on either side of the routes (60-meter-wide survey corridor).	<p>SCE is currently proposing approximately 32 miles of fiber optic telecommunications cable and an approximately 1.77 acre staging area, and requests the following revision for clarification.</p> <p>The Proposed Project Area includes the 6.3-acre substation site, <u>approximately and a total of 320 miles of fiber optic telecommunication routes with a 30-meter buffer on either side of the routes (60-meter-wide survey corridor)- and an approxiamtely 1.77 acre staging area.</u></p>
5.3	5-66	Regulatory Background section contains no reference to GO 131-D and inapplicability of local regulations (see e.g., Section 5.2 at 5-57).	<p>SCE recommends the insertion of language between “Regulatory Background” and “Federal Clean Air Act” header. The additional proposed language provides consistency with other environmental sections and clarifies relationship of local regulations to public utility projects.</p> <p><u>“The regulatory framework provided in this section identifies federal, State, regional, or local statutes, ordinances, or policies that protect or enhance air quality in the Proposed Project area.</u></p> <p><u>The California Public Utilities Commission (CPUC) General Order No. 131-D, Section XIV B states that “local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the Commission’s jurisdiction. However, in locating such projects, the public utilities shall consult with local agencies regarding land use matters.” As a public utility project that is subject to the jurisdiction of the CPUC, the Proposed Project is exempt from local regulation and discretionary permits. As such, the regional and local regulatory standards are provided in this analysis for informational purposes only.”</u></p>

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Chapter	Page	IS/MND Language	SCE Recommendations
5.3.2 b 5.5.1	5-69 5-138	...segments, and 30 miles of fiber optic cable on poles and in conduit... ...and a total of 30 miles of fiber optic telecommunications routes...	SCE is currently proposing approximately 32 miles of fiber optic telecommunications cable, and requests the following revision for clarification. segments, and <u>approximately 302</u> miles of fiber optic <u>telecommunications</u> cable on poles and in conduit... ...and a total of <u>approximately 302</u> miles of fiber optic telecommunications routes...
5.3.2 d	5-72	The proposed substation site would be approximately 1.6 miles from the nearest location of sensitive receptors, the California Correctional Institution; the nearest residential development would be in the community of Stallion Springs, approximately 2 miles from the site. Three residences are within 0.5 miles of the substation site, with the nearest being 0.25 miles to the south on Pellister Road.	SCE proposes the following for clarification. The proposed substation site would be approximately 1.6 <u>0.25</u> miles from the nearest location of sensitive receptors; <u>three residences are within 0.5 miles of the substation site, with the nearest being 0.25 miles to the south on Pellister Road.</u> The California Correctional Institution is approximately 1.6 miles east of the substation site; the nearest residential development would be in the community of Stallion Springs, approximately 2 miles from the site. Three residences are within 0.5 miles of the substation site, with the nearest being 0.25 miles to the south on Pellister Road.

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Chapter	Page	IS/MND Language	SCE Recommendations
5.4	5-85	Regulatory Background section contains no reference to GO 131-D and inapplicability of local regulations (see e.g., Section 5.2 at 5-57).	<p>SCE recommends the insertion of language between “Regulatory Background” and “Federal Endangered Species Act” header. The additional proposed language provides consistency with other environmental sections and clarifies relationship of local regulations to public utility projects.</p> <p><u>“The regulatory framework provided in this section identifies federal, State, regional, or local statutes, ordinances, or policies that protect biological resources in the Proposed Project area.</u></p> <p><u>The California Public Utilities Commission (CPUC) General Order No. 131-D, Section XIV B states that “local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the Commission’s jurisdiction. However, in locating such projects, the public utilities shall consult with local agencies regarding land use matters.” As a public utility project that is subject to the jurisdiction of the CPUC, the Proposed Project is exempt from local regulation and discretionary permits. As such, the regional and local regulatory standards are provided in this analysis for informational purposes only.”</u></p>
5.4	5-89	Add footnote clarifying that the APMs originally proposed by SCE are captured within and are superseded by the proposed Project’s mitigation measures.	<p>SCE recommends the insertion of the following footnote within “Applicant Proposed Measures” header. SCE’s APMs are superseded by the applicable mitigation measures.</p> <p><u>“SCE’s originally proposed APMs are part of the Proposed Project and were considered in the evaluation of environmental impacts. The mitigation measures referenced in Sections 5 and 6 either expand upon or add detail to the APMs and for the purposes of the Proposed Project, supersede them.”</u></p>

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Chapter	Page	IS/MND Language	SCE Recommendations
5.5	5-142	Add footnote clarifying that the APMs originally proposed by SCE are captured within and are superseded by the proposed Project’s mitigation measures.	<p>SCE recommends the insertion of the following footnote within “Applicant Proposed Measures” header. SCE’s APMs are superseded by the applicable mitigation measures.</p> <p><u>“SCE’s originally proposed APMs are part of the Proposed Project and were considered in the evaluation of environmental impacts. The mitigation measures referenced in Sections 5 and 6 either expand upon or add detail to the APMs and for the purposes of the Proposed Project, supersede them.”</u></p>
5.6	5-153	Regulatory Background section contains no reference to GO 131-D and inapplicability of local regulations (see e.g., Section 5.2 at 5-57).	<p>SCE recommends the insertion of language between “Regulatory Background” and “Federal” header. The additional proposed language provides consistency with other environmental sections and clarifies relationship of local regulations to public utility projects.</p> <p><u>“The regulatory framework provided in this section identifies federal, State, regional, or local statutes, ordinances, or policies that protect biological resources in the Proposed Project area.</u></p> <p><u>The California Public Utilities Commission (CPUC) General Order No. 131-D, Section XIV B states that “local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the Commission’s jurisdiction. However, in locating such projects, the public utilities shall consult with local agencies regarding land use matters.” As a public utility project that is subject to the jurisdiction of the CPUC, the Proposed Project is exempt from local regulation and discretionary permits. As such, the regional and local regulatory standards are provided in this analysis for informational purposes only.”</u></p>

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5.6.1 Soils	5-148	Soils within the Proposed Project area reflect the underlying rock type,	SCE recommends the following language be included for accuracy. Soils within the Proposed Project area <u>typically</u> reflect the underlying rock type,	D-21
5.6.1 Slope Stability	5-149	Important factors that affect the slope stability of an area include the steepness of the slope, the relative strength of the underlying rock material, and the thickness and cohesion of the overlying colluvium and alluvium.	SCE recommends the following language be included for accuracy. Important factors that affect the slope stability of an area include the steepness of the slope, the relative strength of the underlying rock material, <u>the geologic structure</u> , and the thickness and cohesion of the overlying colluvium and alluvium.	D-22
5.6.1 Slope Stability	5-150	The Proposed Project components traverse flat to relatively flat topography and no known landslides occur in the immediate project vicinity, therefore landslides and other slope failures would not occur.	SCE recommends the following language be included for accuracy. The Proposed Project components traverse flat to relatively flat topography and no known landslides occur in the immediate project vicinity, therefore landslides and other slope failures would <u>are highly unlikely not to</u> occur.	D-23
5.6.2 iv) Landslides?	5-157	NO IMPACT. The Proposed Project components are on and traverse flat to relatively flat topography and no known landslides occur in the immediate project vicinity, therefore landslides and other slope failures would not occur, thus there would be no impact related to landslides or slope instability.	SCE recommends the following language be included for accuracy. NO IMPACT. The Proposed Project components are on and traverse flat to relatively flat topography and no known landslides occur in the immediate project vicinity, therefore landslides and other slope failures <u>are highly unlikely would not to</u> occur, thus there would be no impact related to landslides or slope instability.	D-24
5.6.2 b	5-157	However, Mitigation Measure G-2 provides for a Stormwater Pollution Prevention Plan (SWPPP)...	SCE recommends the following language be included for accuracy. However, Mitigation Measure <u>HYD-1G-2</u> provides for a Stormwater Pollution Prevention Plan (SWPPP)...	D-25

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Chapter	Page	IS/MND Language	SCE Recommendations
5.8	5-173	Regulatory Background section contains no reference to GO 131-D and inapplicability of local regulations (see e.g., Section 5.2 at 5-57).	<p>SCE recommends the insertion of language after the “Local” header. The additional proposed language provides consistency with other environmental sections and clarifies relationship of local regulations to public utility projects.</p> <p><u>“The California Public Utilities Commission (CPUC) General Order No. 131-D, Section XIV B states that “local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the Commission’s jurisdiction. However, in locating such projects, the public utilities shall consult with local agencies regarding land use matters.” As a public utility project that is subject to the jurisdiction of the CPUC, the Proposed Project is exempt from local regulation and discretionary permits. As such, the regional and local regulatory standards are provided in this analysis for informational purposes only.”</u></p>
5.8	5-173	Add footnote clarifying that the APMs originally proposed by SCE are captured within and are superseded by the proposed Project’s mitigation measures.	<p>SCE recommends the insertion of the following footnote within “Applicant Proposed Measures” header. SCE’s APMs are superseded by the applicable mitigation measures.</p> <p><u>“SCE’s originally proposed APMs are part of the Proposed Project and were considered in the evaluation of environmental impacts. The mitigation measures referenced in Sections 5 and 6 either expand upon or add detail to the APMs and for the purposes of the Proposed Project, supersede them.”</u></p>

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Chapter	Page	IS/MND Language	SCE Recommendations
5.8	5-174	<p>MM H-1 Prepare and Implement Worker Environmental Awareness Program (WEAP). A project specific WEAP shall be prepared and submitted to the CPUC for approval prior to construction. The WEAP shall include, at a minimum, the following provisions related to hazards and hazardous materials:</p> <ul style="list-style-type: none"> ▪ A presentation shall be prepared by SCE and used to train all site personnel prior to the commencement of work. A record of all trained personnel shall be kept. ▪ Instruction on compliance with Proposed Project mitigation measures. <p>...</p>	<p>SCE recommends the following revision for consistency with the MMCRP in Section 6.</p> <p>MM H-1 Prepare and Implement Worker Environmental Awareness Program (WEAP). <u>ASCE shall develop and implement a project specific WEAP, which shall be prepared and submitted to the CPUC for review and approval prior to construction.</u> The WEAP shall include, at a minimum, the following provisions related to hazards and hazardous materials:</p> <ul style="list-style-type: none"> ▪ A presentation shall be prepared by SCE and used to train all site personnel prior to the commencement of work. A record of all trained personnel shall be kept <u>and provided to the CPUC as requested. Crewmembers who have attended the WEAP training presentation shall be provided with a card or a hard hat sticker indicating that they have completed the WEAP training.</u> ▪ <u>Instruction on compliance with Proposed Project mitigation measures, including site specific biological resource protective measures.</u> <p>...</p>

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5.8.2 a	5-174	<p>If disposed of, these treated wood poles would be classified as Treated Wood Waste (TWW) and would be required to be disposed of in a RWQCB approved Treated Wood Waste Landfill, or a Class I hazardous waste landfill.</p>	<p>SCE is subject to the California Health and Safety Code Division 20, Article 4, Section 25143.1.1 – Wood waste; conditions for exemptions, (b) – excludes wood waste that has been treated with a preservative and that has been removed from electric, gas, or telephone service from the management requirements set forth in Section 25150.7. By using this exemption, Edison is relieved of the training, management, and reporting requirements set forth in Section 25150.7. For wood waste from a utility the requirements are limited to the following:</p> <p>(1)The wood waste is not subject to regulation as a hazardous waste under the federal act.</p> <p>(2) The wood waste is disposed of in a composite-lined portion of a municipal solid waste landfill that meets any requirements imposed by the state policy adopted pursuant to Section 13140 of the Water Code and regulations adopted pursuant to Sections 13172 and 13173 of the Water Code.</p> <p>(3) The solid waste landfill used for the disposal is authorized to accept the wood waste under waste discharge requirements issued by the California regional water quality control board pursuant to Division 7 (commencing with Section 13000) of the Water Code). Based on these requirements SCE is proposing the following revisions.</p> <p>If disposed of, these treated wood poles would be classified as <u>Utility Wood Waste (UWW)</u>, which is a <u>category</u> of Treated Wood Waste (TWW) and would be required to be disposed of in a RWQCB approved Treated Wood Waste <u>UWW/TWW</u> Landfill, or a Class I hazardous waste landfill.</p>
5.8.2 a	5-174	<p>...the replacement of 39 subtransmission poles, and the installation of the new fiber optic telecommunication cables...</p>	<p>SCE recommends the following removal for accuracy.</p> <p>...the replacement of 39 subtransmission poles, and the installation of the new fiber optic telecommunication cables...</p>

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5.9.1	5-181	Please see Figure 5.9-1.	It appears that Figure 5.9.1 is missing from the document.
5.9.1	5-182	...please see Figure 5.9-2	It appears that Figure 5.9-2 is missing from the document.
5.9	5-185	Regulatory Background section contains no reference to GO 131-D and inapplicability of local regulations (see e.g., Section 5.2 at 5-57).	<p>SCE recommends the insertion of language between “Regulatory Background” and “Federal” header. The additional proposed language provides consistency with other environmental sections and clarifies relationship of local regulations to public utility projects.</p> <p><u>“The regulatory framework provided in this section identifies federal, State, regional, or local statutes, ordinances, or policies that protect hydrological resources in the Proposed Project area.</u></p> <p><u>The California Public Utilities Commission (CPUC) General Order No. 131-D, Section XIV B states that “local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the Commission’s jurisdiction. However, in locating such projects, the public utilities shall consult with local agencies regarding land use matters.” As a public utility project that is subject to the jurisdiction of the CPUC, the Proposed Project is exempt from local regulation and discretionary permits. As such, the regional and local regulatory standards are provided in this analysis for informational purposes only.”</u></p>

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5.9	5-186 - 187	<p>“MM HYD-1 Develop Stormwater Pollution Prevention Plan and Implement Best Management Practices. The Applicant shall develop a Stormwater Pollution Prevention Plan (SWPPP), as outlined in General Permit 2009-0009-DWQ, which will describe best management practices (BMPs) to prevent the acceleration of natural erosion and sedimentation rates.</p> <p>The SWPPP will include a written site-specific Construction Site Monitoring Program (CSMP). A monitoring program, which shall include a reporting requirement to the CPUC, will be established to ensure that the prescribed BMPs are followed during project construction. BMPs shall include but not be limited to the following:</p> <ul style="list-style-type: none"> ▪ Use of silt fences or other sediment containment methods placed around and/or down slope of disturbed areas prior to construction; ▪ Protection of drain inlets from receiving polluted stormwater through the use of filters, such as fabrics, gravel bags, or straw wattles; ▪ Construction of a stabilized construction entrance/exit to prevent tracking onto roadways; ▪ Establishment of a vehicle storage, maintenance, and refueling area, if needed, to minimize the spread of oil, gas, and engine fluids. Use of oil pans under stationary vehicles is strongly recommended; and ▪ No overnight parking of mobile equipment within 100 feet of wetlands, culverts, or creeks. Stationary equipment (e.g., pumps, generators) used or stored within 100 feet of wetlands, culverts, or creeks will be positioned over secondary containment. <p>...”</p>	<p>SCE recommends the following revision for consistency with the MMCRP in Section 6.</p> <p>“MM HYD-1 Develop Stormwater Pollution Prevention Plan and Implement Best Management Practices. The Applicant shall develop a Stormwater Pollution Prevention Plan (SWPPP), as <u>required by the RWQCB and as</u> outlined in General Permit 2009-0009-DWQ, which will describe best management practices (BMPs) to prevent the acceleration of natural erosion and sedimentation rates.</p> <p>The SWPPP will include a written site-specific Construction Site Monitoring Program (CSMP). A monitoring program, which shall include a reporting requirement to the CPUC, will be established to ensure that the prescribed BMPs are followed during project construction. BMPs shall include but not be limited to the following:</p> <ul style="list-style-type: none"> ▪ Use of silt fences or other sediment containment methods placed around and/or down slope of disturbed areas prior to construction; ▪ Protection of drain inlets from receiving polluted stormwater through the use of filters, such as fabrics, gravel bags, or straw wattles; ▪ Construction of a stabilized construction entrance/exit to prevent tracking onto roadways; ▪ Establishment of a vehicle storage, maintenance, and refueling area, if needed, to minimize the spread of oil, gas, and engine fluids. Use of oil pans under stationary vehicles is strongly recommended; and ▪ No<u>Prohibition on</u> overnight parking of mobile equipment within 100 feet of wetlands, culverts, or creeks. Stationary equipment (e.g., pumps, generators) used or stored within 100 feet of wetlands, culverts, or creeks will be positioned over secondary containment. <p>...”</p>

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5.9	5-188	“MM HYD-2 Use Non-potable Water for Dust Control or Soil Compaction. Project water supply for dust control or soil compaction activities shall be obtained from non-potable sources, if available, and ensured in a water contract through a local water agency or district.”	SCE recommends the following revision for consistency with the MMCRP in Section 6. “MM HYD-2 Use Non-potable Water for Dust Control or Soil Compaction. Project water supply for dust control or soil compaction activities shall be obtained from non-potable sources, if <u>reasonably available from local water purveyors</u> , and ensured in a water contract through a local water agency or district.”
5.9.2 b	5-188	MM HYD-2 Use Non-potable Water for Dust Control or Soil Compaction. Project water supply for dust control or soil compaction activities shall be obtained from non-potable sources, if available, and ensured in a water contract through a local water agency or district.	SCE recommends the following revision for consistency with the MMCRP in Section 6. MM HYD-2 Use Non-potable Water for Dust Control or Soil Compaction. Project water supply for dust control or soil compaction activities shall be obtained from non-potable sources, if <u>reasonably available from local water purveyors</u> , and ensured in a water contract through a local water agency or district.

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Chapter	Page	IS/MND Language	SCE Recommendations
5.10	5-192	Regulatory Background section contains no reference to GO 131-D and inapplicability of local regulations (see e.g., Section 5.2 at 5-57).	<p>SCE recommends the insertion of language between “Regulatory Background” and “Kern County General Plan” header. The additional proposed language provides consistency with other environmental sections and clarifies relationship of local regulations to public utility projects.</p> <p><u>“The regulatory framework provided in this section identifies regional or local statutes, ordinances, or policies regarding land use and planning in the Proposed Project area.</u></p> <p><u>The California Public Utilities Commission (CPUC) General Order No. 131-D, Section XIV B states that “local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the Commission’s jurisdiction. However, in locating such projects, the public utilities shall consult with local agencies regarding land use matters.” As a public utility project that is subject to the jurisdiction of the CPUC, the Proposed Project is exempt from local regulation and discretionary permits. As such, the regional and local regulatory standards are provided in this analysis for informational purposes only.”</u></p>

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Comment Set D, cont.
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Chapter	Page	IS/MND Language	SCE Recommendations
5.11	5-200	Regulatory Background section contains no reference to GO 131-D and inapplicability of local regulations (see e.g., Section 5.2 at 5-57).	<p>SCE recommends the insertion of language between “Regulatory Background” and “State” header. The additional proposed language provides consistency with other environmental sections and clarifies relationship of local regulations to public utility projects.</p> <p><u>“The regulatory framework provided in this section identifies State, regional or local statutes, ordinances, or policies regarding mineral resources in the Proposed Project area.</u></p> <p><u>The California Public Utilities Commission (CPUC) General Order No. 131-D, Section XIV B states that “local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the Commission’s jurisdiction. However, in locating such projects, the public utilities shall consult with local agencies regarding land use matters.” As a public utility project that is subject to the jurisdiction of the CPUC, the Proposed Project is exempt from local regulation and discretionary permits. As such, the regional and local regulatory standards are provided in this analysis for informational purposes only.”</u></p>

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Chapter	Page	IS/MND Language	SCE Recommendations
5.12	5-205	Regulatory Background section contains no reference to GO 131-D and inapplicability of local regulations (see e.g., Section 5.2 at 5-57).	<p>SCE recommends the insertion of language after paragraph ending in "...the local requirements" and the "Kern County General Plan" header. The additional proposed language provides consistency with other environmental sections and clarifies relationship of local regulations to public utility projects.</p> <p><u>"The California Public Utilities Commission (CPUC) General Order No. 131-D, Section XIV B states that "local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the Commission's jurisdiction. However, in locating such projects, the public utilities shall consult with local agencies regarding land use matters." As a public utility project that is subject to the jurisdiction of the CPUC, the Proposed Project is exempt from local regulation and discretionary permits. As such, the regional and local regulatory standards are provided in this analysis for informational purposes only."</u></p>
5.17	5-247	"Other solid waste generated during construction of the Proposed Project would be temporarily stored in a designated area of laydown yards and would be reused or disposed in a manner consistent with applicable federal, State, and local statutes and regulations related to solid waste. Therefore, the Proposed Project would comply with federal, State, and local statutes and regulations related to solid waste disposal limits and landfill capacities. No impact would occur."	<p>In order to provide consistency with GO 131-D description on page 5-244 and to clarify the relationship of local regulations to public utility projects, SCE recommends the following revision.</p> <p>"Other solid waste generated during construction of the Proposed Project would be temporarily stored in a designated area of laydown yards and would be reused or disposed in a manner consistent with applicable federal, State, and local statutes and regulations related to solid waste. Therefore, the Proposed Project would comply with <u>applicable federal, State, and local</u> statutes and regulations related to solid waste disposal limits and landfill capacities. No impact would occur."</p>

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Chapter	Page	IS/MND Language	SCE Recommendations
5.19	5-251	Add footnote clarifying that the APMs originally proposed by SCE are captured within and are superseded by the proposed Project’s mitigation measures.	<p>SCE recommends the insertion of the following footnote after the reference to “BIO-5” within the first full paragraph. SCE’s APMs are superseded by the applicable mitigation measures.</p> <p><u>“SCE’s originally proposed APMs are part of the Proposed Project and were considered in the evaluation of environmental impacts. The mitigation measures referenced in Sections 5 and 6 either expand upon or add detail to the APMs and for the purposes of the Proposed Project, supersede them.”</u></p>

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